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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**(Portland Division)**

**MALBCO HOLDINGS, LLC**, a Washington  
limited liability company,

Civil No. 3:14-cv-947-PK

Plaintiff,

v.

**BHUPENDRA R. PATEL and NILA B. PATEL**,  
husband and wife; **HEETAN B. PATEL; HEETAL**  
**B. PATEL-MANINI; and MUKESH PATEL**,

Defendants.

**DEFENDANTS BHUPENDRA R.  
PATEL'S AND NILA B. PATEL'S  
REPLY IN SUPPORT OF  
MOTION TO DISMISS  
MALBCO'S CLAIM FOR  
ATTORNEY FEES AND  
PUNITIVE DAMAGES IN  
SECOND AMENDED  
COMPLAINT**

**ORAL ARGUMENT REQUESTED**

For their reply in support of their Motion to Dismiss Malbco's Claim for Attorney Fees and Punitive Damages in Second Amended Complaint (Doc No. 129), the Patel Parents join in and adopt the arguments set forth in the Reply in Support of Defendants Heetan and Heetal Patel's Motion to Dismiss Malbco's Claim for Attorney Fees and Punitive Damages in Second Amended Complaint (filed this same day) as if fully set forth in this Reply.

DATED this 23rd day of June, 2016.

TONKON TORP LLP

By: *s/Zachary W.L. Wright*

Timothy J. Conway, OSB No. 851752

Zachary W.L. Wright, OSB No. 941615

Attorneys for Defendants Bhupendra R. Patel and  
Nila B. Patel

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **DEFENDANTS BHUPENDRA R. PATEL'S AND NILA B. PATEL'S REPLY IN SUPPORT OF MOTION TO DISMISS MALBCO'S CLAIM FOR ATTORNEY FEES AND PUNITIVE DAMAGES IN SECOND AMENDED COMPLAINT** on the parties listed below:

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Attorneys for Defendants Heetan B.  
Patel and Heetal B. Patel-Manani

- by electronic means through the Court's Case Management/Electronic Case File system on the date set forth below
- by causing a copy thereof to be e-mailed to each attorney at said attorney's last-known email address on the date set forth below

DATED this 23rd day of June, 2016.

TONKON TORP LLP

By: /s/Zachary W.L. Wright  
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